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13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 CHAD BETTS,

16 Plaintiff,

17 vs.

18 CLARITY SERVICES, INC., EXPERIAN
19 INFORMATION SOLUTIONS, INC., FAY
20 SERVICING, LLC,

21 Defendants.

Case No.: 2:22-cv-02162-JCM-EJY

**JOINT MOTION TO EXTEND
DEADLINE TO RESPOND TO
PLAINTIFF'S FIRST AMENDED
COMPLAINT (SECOND REQUEST)**

22 Plaintiff, Chad Betts ("Plaintiff"), and Defendant, Fay Servicing, LLC ("Defendant")
23 (collectively "Parties"), by and through their counsel of record, hereby stipulate and agree as
24 follows:

25 On January 18, 2023, Plaintiff filed his First Amended Complaint [ECF No. 4]. Defendant
26 was served with Plaintiff's First Amended Complaint on January 23, 2023. The deadline for
27 Defendant to respond to Plaintiff's First Amended Complaint is February 13, 2023. On January
28 26, 2023, this Court entered an Order extending the deadline to respond to the First Amended
Complaint to March 15, 2023 [ECF No.9].

WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendant to
file its responsive pleading to Plaintiff's First Amended Complaint to April 14, 2023.

This is the second motion for an extension of time for Defendant to file its responsive
pleading. The extension is requested in good faith and is not for purposes of delay or prejudice to

1 any other party.

2 As part of this motion, Defendant agrees to participate in any Rule 26(f) conference that
3 occurs during the pendency of this extension.

4 DATED this 15th day of March, 2023.

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6 WRIGHT, FINLAY & ZAK, LLP

FREEDOM LAW FIRM

7 /s/ Ramir M. Hernandez

/s/ Gerardo Avalos

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15 IT IS SO ORDERED:

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17 UNITED STATES MAGISTRATE JUDGE

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19 DATED: March 15, 2023